Purpose: The process of closing out a sponsored project for SPA includes coordinating/completing document submission, and performing various actions in GMAS. Below is guidance related to both standard and non-standard situations, as well as best practices.

Considerations: When submitting documentation for closeout

1) Federal: The standard documentation required by federal agencies is listed below, with the SUBMITTING party indicated in parentheses:
   - Final financial report (OSP)
   - Final progress report (PI)
   - Final invention statement (SPA)

   While the manner in which the final invention statement process is coordinated may vary on the SRA and department’s needs, best practice dictates that SPA will confirm the final invention status with both OTD and the department.

   We may also be asked by some federal sponsors for an equipment report addressing any capital equipment that may have been purchased during the period of the project. The above is for the standard federal grant or cooperative agreement. For federal contracts or some cooperative agreements the requirements may be different. For these other closeout situations consult with your AD.

2) Non Federal: The requirements for a non-federal award closeout can vary greatly. A final accounting or invoice as well as a final report or deliverable is usually due. Other requirements could include the return of any confidential information or remaining funds (including interest), audit requirements, record retention, or receiving final payment. The award notice for non-federal projects should be consulted when approaching the end of the period of performance to be clear on what is required by the sponsor.

3) General: Regardless of the sponsor, if we are a sub we may be asked to sign documents such as a release of liability.

   a. Example: HSPH was a subaward off of a federal grant from another U.S university. At the end of the project period, we received a document that asked us to certify and warrant that no further financial claims would be made. In another situation, an NGO sent us a release from all liabilities. This conflicted with the terms of the agreement and had to be negotiated with the NGO.

Considerations: GMAS closeout activities

Reallocation of funds between subactivities: At award closeout, SRA’s may be asked by their departments to reallocate funds between subactivities. Below are some points of guidance for this:

   a. Some reallocation between subactivities can be done prior to the end of the project period if consistent with the award terms.

   b. Little to no reallocation between subactivities should occur after the period of performance. An exception would be a case where there is a Part of account in another department which didn’t spend out and has notified the primary Org account holder there will be a remaining balance. By transferring the money between accounts, the prime account holder can prevent the funds from
being accidentally spent against by the part of account owner. This prevents scenario where both the “part of” and the “prime” accidentally are counting the funds as their own.

Request closeout:

OSP is unable to “close” a fund if there are any outstanding requests (E.g. request hasn’t had the status updated to “submitted to sponsor” or marked as “not funded/rejected/withdrawn/declined.”)

SPA is responsible for:

(a) Closing any outstanding requests via one of the actions described above
(b) Ensuring any approvals which were outstanding are completed.

SRA’s should follow up with the department on any outstanding requests prior to the end of a project period to allow for closeout.

Document retention
It is not required to track down a final progress report; however, as a best practice, if an SRA has it, s/he should upload it to GMAS in the segment document repository in a folder labeled “Final Reports.” There have been instances where a final progress report was thought to have been submitted but we heard back from the sponsor several years later that they had no record of it. This can help prevent progress reports from being lost.